

1 DAWYN R. HARRISON, County Counsel
STARR COLEMAN, Assistant County Counsel
2 THOMAS R. PARKER, Senior Deputy County Counsel
(SBN 141835) • TParker@counsel.lacounty.gov
3 648 Kenneth Hahn Hall of Administration
500 West Temple Street
4 Los Angeles, California 90012-2713
Telephone: (213) 974-1834
5 Facsimile: (213) 613-4751

6 Thomas C. Hurrell, State Bar No. 119876
E-Mail: thurrell@hurrellcantrall.com
7 Sanaz Rashidi, State Bar No. 271986
E-Mail: srashidi@hurrellcantrall.com
8 HURRELL CANTRALL LLP
725 S. Figueroa Street, Suite 3800
9 Los Angeles, California 90017
Telephone: (213) 426-2000
10 Facsimile: (213) 426-2020

11 Attorneys for Defendants, CLARK R. TAYLOR, AICP, THE LOS ANGELES
COUNTY DEPARTMENT OF REGIONAL PLANNING
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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
15

16 CLINTON BROWN,

17 Plaintiff,

18 v.

19 CLARK R. TAYLOR, AICP, THE
LOS ANGELES COUNTY
20 DEPARTMENT OF REGIONAL
PLANNING,
21

22 Defendants.
23

Case No. 2:22-cv-09203-MEMF-KS

**DECLARATION OF SANAZ
RASHIDI ISO DEFENDANTS'
OPPOSITION TO PLAINTIFF'S
MOTION FOR LEAVE TO AMEND
COMPLAINT**

Assigned to:
Hon. Maame Ewusi-Mensah Frimpong
Courtroom "8B"

Magistrate Judge Karen L. Stevenson
Courtroom "580"

24 I, Sanaz Rashidi, declare as follows:
25

26 1. I am an attorney duly licensed to practice before this Court and am an
27 associate with Hurrell Cantrall LLP, attorneys of record for Defendant Clark R.
28 Taylor. AICP. The Los Angeles County Department of Regional Planning herein.

1 The facts set forth herein are of my own personal knowledge and if sworn I could
2 and would testify competently thereto.

3 2. Mr. Brown did not comply with the District's Local Rule 7-3, which
4 states a party must "first contact opposing counsel to discuss thoroughly, preferably
5 in person, the substance of the contemplated motion and any potential resolution" at
6 least seven days before filing a motion. Mr. Brown undisputedly did not comply
7 with this requirement, and in fact, never informed Defendants of his intention to file
8 his motion.

9 I declare under penalty of perjury under the laws of the State of California
10 that the foregoing is true and correct.

11 Executed on March 6, 2025, at Los Angeles, California.

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13 /s/ Sanaz Rashidi
14 Sanaz Rashidi
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